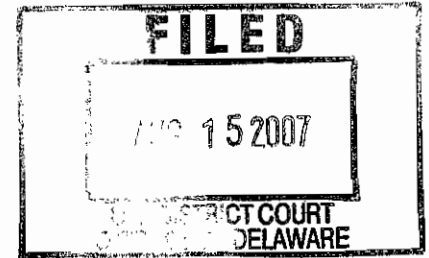


IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE



DALE A. GUILFOIL,
Partner

V.

DAVID PIERCE, et, al.
Defendant

C. A. No. 06-493-GMS

JURY TRIAL REQUESTED

PLAINTIFF'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS AND REQUEST FOR INSPECTION

Pursuant to Rules 26 and 34 of the Federal Rules of civil procedure, plaintiff hereby serve on Defendants, David Pierce et al., the following Request for Production of Documents and Inspection, measuring and photographing of living quarters.

REQUEST FOR PRODUCTION

Request No. 1:

D. Any and all medical records of plaintiff from the time of his incarceration in the Delaware Correctional Center through and including to the date of his transfer to the Central Violation of Probation Center in August of 2006.

REQUEST No. 2:

2). List of names of the inmates transfered into and out of the housing area known as W-Building. Teir-B, Cell 4, along with bunk assignments, for the months of February 2006 thru August 2006.

REQUEST FOR MEASURING AND PHOTOGRAPHING

REQUEST NO. 3;

3. Plaintiff request to enter the unit known as W+ Building at the Delaware Correctional Center to measure and photograph the bunk and cell areas of B-Teir.

Date: August 12, 2007

Dale Guilford
Dale Guilford #166308
Sussex Correctional Center
Post Office Box 500
Georgetown, DE 19974

CERTIFICATE OF SERVICE

I Dale Guiltfoi, certify that on August 12, 2007 I have mailed a copy of the foregoing motion for, Request for Production of Documents and Request for Inspection, to Eileen Kelly (I.D. 2884) Attorney for Defendants at 820 N. French St 6th Floor, Wilmington, DE 19801

Date: August 12, 2007

Dale Guiltfoi
Dale Guiltfoi #166308
Sussex Correctional Center
Post Office Box 500
Georgetown, DE 19147

I/M: Dale Guilford BLDG: Min. 500
SUSSEX CORRECTIONAL INSTITUTION
P.O. BOX 500 ⁴ 166308
GEORGETOWN, DELAWARE 19947

U.S.M.S.
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Office of the Clerk

United States District Court

844 N. King Street box 18

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